

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE
CAIRES, GRAE KINDEL, ALEXIS
CAMACHO, JESSICA PAN, EMILY
KIM, MIGUEL BARRETO, and BRETT
MENZIES FOLKINS, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

TWITTER, INC.

Defendant.

C.A. No. 1:23-cv-00441-TMH

**PLAINTIFFS' MOTION TO PROVISIONALLY SEAL NOTICE OF
ADDITIONAL SUPPLEMENTAL AUTHORITY AND REPLY TO
TWITTER'S RESPONSE TO PRIOR NOTICE OF SUPPLEMENTAL
AUTHORITY AND ACCOMPANYING EXHIBITS**

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Pursuant to this Court’s Manuals on filing, including Electronic Filing Tips for Attorneys and Electronic Filing of Sealed Civil Documents, Plaintiffs hereby move to provisionally seal their Notice of Additional Supplemental Authority and Reply to Twitter’s Response to Prior Notice of Supplemental Authority (the “Notice and Reply”) (attached as Exhibit A) and accompanying exhibits (attached hereto as Exhibits B-G respectively).

The Notice and Reply (Exhibit A) informs the Court of four more arbitration awards (Exhibits 1-4 to the Notice and Reply, attached hereto as Exhibits B-E) that Plaintiffs’ counsel have obtained on behalf of former Twitter employees who brought claims against Twitter in arbitration, provides context for those decisions, and refutes the arguments that Twitter made with regard to Plaintiffs’ Notice of Supplemental Authority of November 26, 2024 (Dkts. 98, 99). Exhibit 5 to the Notice and Reply (attached hereto as Exhibit F) is a discovery letter submitted by Twitter in an arbitration. Exhibit 6 to the Notice and Reply (attached hereto as Exhibit G) is a copy of Twitter’s Notice of Supplemental Authority that it filed in multiple proceedings with respect to one of the arbitration awards.

Because Twitter takes the position that arbitration awards and filings are confidential, Plaintiffs have filed the documents under seal.

Plaintiffs therefore request leave to provisionally file Exhibits A-G under seal. Because the arbitral awards contain some personally identifying information,

if the Court is disinclined to permit the entirety of the documents to be filed under seal, Plaintiffs respectfully request the opportunity to submit redacted versions removing identifying information for the Claimants in those arbitrations.

Dated: January 8, 2025

Respectfully submitted,

EMMANUEL CORNET, JUSTINE DE CAIRES, GRAE KINDEL, ALEXIS CAMACHO, JESSICA PAN, EMILY KIM, MIGUEL BARRETO, and BRETT MENZIES FOLKINS, on behalf of themselves and all others similarly situated,

By their attorneys,

/s/ Kate Butler

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CERTIFICATE OF SERVICE

I, Kate Butler, hereby certify that a true and accurate copy of the redacted version of this document was served on all counsel of record for Defendant via filing on the Court's CM/ECF system and that Plaintiffs have served the sealed version of this document on Defendant's counsel via email on January 8, 2025.

/s/ Kate Butler
Kate Butler